

## IN THE UNITED STATES COURT OF FEDERAL CLAIMS

GORDON D. SONDLAND

Plaintiff,

v.

THE UNITED STATES OF AMERICA

Defendant.

No. 21-2083C  
(Judge Honorable Loren A. Smith)**PLAINTIFF'S EXHIBIT LIST**

No.	Description	Offered	Authenticity Stipulation	Admissibility Stipulation	Admitted
1.	Plaintiff's Amended Complaint [Dkt. 25]				
2.	Westfall Certification [Dkt. 12]				
3.	09-26-2019 Email from McDermott to Lisa Kenna re Payment of Fees				
4.	09-27-2019 Letter to Pompeo re Depo Schedule - US0000921-0000924				
5.	09-27-2019 Letter to Sondland from Engel and Schiff re Deposition Appearance on 10-10-2019				
6.	09-29-2019 Luskin email to String, Sondland, McDermott, Kenneth Thomas and Geneva Sarni re Compliance with RFD Requests				

7.	10-04-2019 Email from McDermott to Marik String re Claims for Costs				
8.	10-07-2019 Letter to Luskin from Brian Bulatao re Instructions Not to Appear				
9.	10-21-2019 Email from Carol Leonnig to Luskin re scope of depo and documents (PH_02891-02892)				
10.	10-08-2019 Email from Sondland to Pompeo re Prep for Testimony				
11.	10-08-2019 Letter to Sondland from Adam Schiff; Elijah Cummings re Deposition Appearance on 10-16-2019				
12.	10-14-2019 Letter to Sondland from Adam Schiff; Elijah Cummings re Depo on 10-17-2019				
13.	10-25-2019 Email re payments made (SONDLAND_000653-000717)				
14.	11-04-2019 Declaration of Gordon Sondland				
15.	11-07-2019 Email from Clifton Johnson to Sondland re Info on Assistance with Private Counsel Fees				
16.	11-12-2019 Subpoena to Gordon Sondland				
17.	11-21-2019 Senate Letter to Pompeo (US0001899-1900)				

18.	11-24-2019 Email from Robert Luskin to Marik String re DOS Legal Assistance Program				
19.	12-09-2019 Email from Roberts to Marik String with Sondland invoices				
20.	01-28-2020 Email from Sondland to Bechbuhl re Payment of Sondland invoices				
21.	02-06-2020 Schedule for T. Ulrich Bechbuhl				
22.	02-24-2020 Email from Jim McDermott to Sondland re Inquiry on Status of Legal Fees				
23.	03-04-2020 - Email from Luskin to Liberman re Partial Reimbursement				
24.	06-09-2020 Email from Burke to Luskin re DOS reimbursement (Burck Ex. 2)				
25.	06-23-2020 letter from Paul Hastings to Marik String re Final Attempt for Payment of Fees				
26.	08-28-2020 Email from Luskin to String re Sondland reimbursement (US0001151)				
27.	09-10-2020 Email from Luskin to Marik String re Phone Call re Assurances to Sondland re Reimbursement of Expenses in Full				
28.	09-24-2020 Email from Burck to Luskin re connecting with Pompeo				

29.	Defendant Response to Plaintiff's Interrogatories				
30.	Handwritten Notes of Kwame Manley				
31.	Itemization of Monies Due to Sondland				
32.	Notes of James McDermott				

Additionally, Plaintiff reserves the right to introduce either portions of deposition transcripts or the transcripts in their entirety as trial exhibits.

January 28, 2025

Respectfully submitted,




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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of January, 2025, I electronically filed the foregoing **PLAINTIFF'S EXHIBIT LIST** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

**BRIAN M. BOYNTON**  
Principal Deputy Assistant Attorney General

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Respectfully Submitted,

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